

**UNITED STATES DISTRICT COURT
WESTER DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA

v.

FRANKLIN BARRETT SECHRIEST

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1:22-CR-00053-LY

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now FRANKLIN BARRETT SECHRIEST, defendant herein, by and through his attorney of record in the above styled and numbered cause, and files this Unopposed Motion for Continuance, and in support would show the Court as follows:

Mr. Sechriest is named in a three-count indictment charging him with Hate Crime, Damage to a Religious Property, Use of Fire to Commit a Felony and Arson.

This case is presently set for pretrial motions deadline of August 26, 2022, and Trial on October 3, 2022. The Court is aware that this case will require additional time within which to prepare and negotiate. Presently, both parties are scheduled to meet on August 31, 2022, to discuss possible resolution to the case. Counsel requires additional time with which to confer with the government and his client. Counsel requests an additional 60 days to prepare for trial or seek a resolution.

Matt Devlin, the Assistant United States Attorney in charge of the government case does not oppose this request.

WHEREFORE PREMISES CONSIDERED, Counsel for Mr. Andreescu prays that this Honorable Court grant this motion for continuance for 60 days.

Respectfully submitted,

/S/
Daniel H. Wannamaker
Counsel for Andreescu
13809 Research Blvd., ste 500
Austin, Texas 78701
TX Bar No. 20834300
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CERTIFICATE OF SERVICE

I, Daniel H. Wannamaker, hereby certify that on August 23, 2022, I electronically filed the foregoing motion with the clerk for the U.S. District Court, Western District of Texas, using the electronic filing system for the court. The electronic case filing system sent a “Notice of Electronic Filing to AUSA Matt Devlin.

/S/
Daniel H. Wannamaker

CERTIFICATE OF CONFERENCE

I, Daniel H Wannamaker, attorney for the defendant, do hereby certify that Matt Devlin, the United States Attorney assigned to this matter, was contacted, and informed of this request for a continuance.

/S/
Daniel H. Wannamaker

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ORDER

ON THIS the _____ day of _____, 2020, the Unopposed Motion
for Continuance, and said motion is hereby

GRANTED/DENIED.

SIGNED August ___, 2022.

LEE YEAKEL
UNITED STATES DISTRICT JUDGE